

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

STANLEY BEATY, *et al.*,

Plaintiffs,

v.

**THE HILLSHIRE BRANDS COMPANY,
et al.,**

Defendants.

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Civil Action No. 2:14-CV-58-JRG-RSP

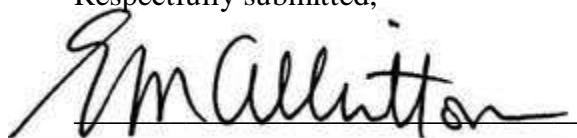
JOINT AND AGREED MOTION TO DISMISS WITH PREJUDICE

Plaintiffs Stanley Beaty, Selma Bell, Theresa Ricks, Stephanie Rose, Erica Williams, the Estate of Dennis Malone, Zolton Dangerfield, Kavin Dean, Charles Frazier Jr., Malissa Franklin, Taknocka Franklin, Lester Green, Michael Harris, Sandra Hickson, Rodney Jenkins, Mary Joyce Johnson, Vernon Milton, Keyon Mitchell, Toquina Reed, Beverly Reeves, Lenia Fay Robinson, Eula Samuels, Sheryl Scott, Michelle Shelton, Joyce Sims, Fannie Slaughter, Belinda Smith, Sharon Taylor, Nolan Wallace, Patricia Williams, Carolyn Brown, Kurt Burkes, Anthony Burton, Tarsha Butler, Angela Calvin, Stephanie Cooper, Latarya Council, Letrice Dangerfield, Daphne Embry-Harris, Daphne Flowers, Ricky Flowers, Damien Franklin, Derek Franklin, Carlos Gill, Donald Harris, Cassandra Holt, Rosiland Holt, Stacie Kimble, Stacy King, Willie McAleaster, Elois Miles, Shatara Moore, Casey Washington, David Washington, Carolyn Williams, and Cherita Woods (collectively, “Plaintiffs”) and Defendants The Hillshire Brands Company (collectively, “Defendants”) file this Joint and Agreed Motion to Dismiss with Prejudice and move the Court for a dismissal of all causes of action raised or which could have

been raised in this case, with prejudice against the Plaintiffs to re-file the same. All costs of court and/or attorneys' fees incurred by the parties will be paid by the parties incurring them.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants respectfully request that all causes of action raised or which could have been raised in the above entitled and numbered case be dismissed with prejudice and that each party will be held responsible for the costs of court and attorneys' fees that they each incurred.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric M. Albritton", written over a horizontal line.

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Respectfully submitted,

/s/ Vanessa Griffith (with permission)

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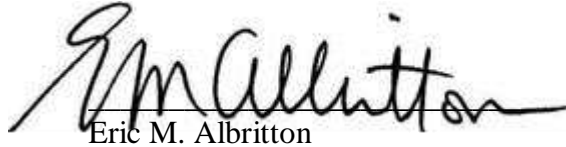
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 18th day of December 2015.


Eric M. Albritton